

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- RENEWAL

PERMITTEE

Sewer Equipment Company of America
Attn: Dan O'Brien
1148 Depot Street
Glenview, Illinois 60025

Application No.: 00050007
Applicant's Designation:
Subject: Metal Equipment Assembly Plant
Date Issued: July 28, 2006
Location: 12 Howard Street, Chadwick

I.D. No.: 015005AAD
Date Received: March 14, 2006
Expiration Date: July 28, 2011

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of three paint booths with filter panels and solvent distillation equipment pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of Hazardous Air Pollutants (HAPs) from the source to less than major source thresholds (i.e., 10 tons/year for a single HAP and 25 tons/year for totaled HAP). As a result, the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits for this location.
2. This permit is issued based upon the metal coating operations at the facility not being subject to 40 CFR 63, Subpart M--- National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. This is consequence of the federally enforceable limitations of this permit restricting potential and actual HAP emissions to below major source threshold levels defined in 40 CFR 63.2.
3. This permit is issued based upon the coating operations being exempt from emission limitations of 35 Ill. Adm. Code 215.204 due to emissions of volatile organic materials (VOM) from the whole facility operations being limited to less than exemption level of 25 tons/year established by Section 218.206(a) (1).
- 4a. The plant-wide VOM emissions from painting and clean-up operations shall not exceed the following limits:

2.5 tons/month; 24.5 tons/year.

- b. The emissions of HAPs as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a Clean Air Act Permit Program permit from the Illinois EPA.

- c. The emissions of VOM and HAP shall be determined from the following equation on a monthly basis:

$$E = \{\Sigma[(P_i \times C_i) + \Sigma(S_j \times C_j)] - W \times C_w\} / 2,000,$$

where:

E - VOM(HAP) emissions (tons);

P_i - paint usage (gallons);

C_i - VOM(HAP) content of the paint (lbs/gallon);

S_j - solvent usage (gallons);

C_j - VOM(HAP) content of the solvent (lbs/gallon);

W - certified amount of waste shipped off for recycling (lbs);

C_w - certified VOM (HAP)* content of waste solvent (weight fraction).

* - HAP content of the waste may be assumed proportional to the HAP content in the VOM used.

- d. These limits define the potential emissions of the VOM and HAPs and are based on the actual emissions determined from maximum production capacity.
- e. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.
- 5a. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5

years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

- b. The Permittee shall maintain monthly records of the following items:
 - i. The name and identification number of each coating used;
 - ii. The usage (gallons/month), VOM and HAP content of each coating (lbs/gallon);
 - ii. The name and identification number of solvents used;
 - iv. The usage (gallons/month), density (lbs/gallon), VOM and HAP content of each solvent (weight percent or lbs/gallon); and
 - v. Certified amount of waste shipped off for recycling (lbs) and its certified VOM (HAP) content (weight fraction).
 - vi. The emission of VOM and each individual and total HAP with supporting calculations for current month and total running for last 12 months (tons/month, tons/year).
- 6. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five years from the date of entry and shall be made available for inspection and copying by the Illinois EPA and USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.
- 7. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance and Enforcement Section in Springfield, Illinois within 30 days after the exceedance.

The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedances or violation and efforts to reduce emissions and future occurrences.

8. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance and Enforcement Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
5415 North University
Peoria, Illinois 61614

If you have any questions on this, please call Valeriy Brodsky at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:VJB:psj

cc: Illinois EPA, FOS Region 2
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emission from the Metal Equipment Assembly Plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. This is assumption of 100% evaporation rate of all VOM containing materials. The resulting maximum emissions are below the levels, e.g., 10 tons per year for a single HAP, and 25 tons per year for totaled HAP at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that material is handled, and control measures are more effective than required in this permit.

<u>Emission Units</u>	<u>VOM</u>	<u>Emissions (Tons/Year)</u>	
		<u>Single HAP</u>	<u>Total HAPs</u>
Three Paint Booths	24.5	< 10	< 25

VJB:psj